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November 6, 2000

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VIA COURIER

Jeff S. Jordan, Esq.
General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 5094: The Honorable John Thrasher

Dear Mr. Jordan:

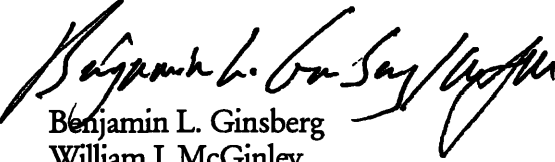
This responds to the letter from the Federal Election Commission (the "Commission") notifying our client, the Honorable John Thrasher, of a complaint filed against him by Michael J. Broder in the above-referenced Matter Under Review ("MUR"). In his complaint, Mr. Broder alleges that the Republican Party of Florida ("RPOF") raised corporate contributions to directly benefit Bill McCullom for U.S. Senate. Since the complaint is long on accusations and innuendoes and short on applicable law and evidence, the Commission should dismiss the complaint and take no further action.

The complaint does not cite any evidence that corporate funds were used in connection with a federal election or that corporate funds were deposited into a federal account. Under the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations, political party committees are permitted raise federal funds for their federal account and non-federal funds for their non-federal account. See 11 C.F.R. §§ 102.5(a)(1)(i) & 106.5(a)(1). These funds may be used for generic party building activities that benefit the entire Republican ticket, including both federal and non-federal candidates. See *id.* § 106.5(a)(2). As stated in the September 8, 2000, Miami Herald article, the event raised federal and non-federal funds within the applicable federal and state limits and the funds raised were not earmarked for any candidate. As Speaker of the Florida House, Mr. Thasher does raise corporate funds for the RPOF, as permitted by Florida law. Accordingly, it appears his activities do not fall under the Act.

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For the reasons stated above, the Commission should dismiss the complaint and take no further action.

Respectfully submitted,


Benjamin L. Ginsberg
William J. McGinley